

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services,)	CC Docket No. 98-67
And Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	
Disabilities)	

**Reply Comments of
Self Help for Hard of Hearing People (SHHH)
to Ultratec's Petition for Clarification Provision of and Cost Recovery for CapTel,
An Enhanced VCO Service**

Introduction

SHHH submits reply comments in response to the Petition for Clarification Provision of and Cost Recovery for CapTel, An Enhanced VCO Service, Docket No. 98-67.

SHHH is a national, consumer organization of people who are hard of hearing based in Bethesda, Maryland with twelve state organizations and 250 chapters. This proceeding is critical to our constituents who prefer VCO when using relay services.

The Commission Should Qualify CapTel to Receive Reimbursement from the TRS Fund

SHHH is in agreement with the original commenters, Hamilton Relay, David Coco, TDI, and all consumers, that Ultratec's request for CapTel to qualify as a telephone transmission service that is eligible to receive reimbursement from the interstate TRS fund, managed by the National Exchange Carrier Association, should be granted by the Commission.

In the same way that video relay brings relay services one step closer to functional equivalence for people who use sign language, CapTel moves VCO towards functional equivalence for those people who prefer and use it. That potential group is huge, since there are currently 35 million people over the age of 65 and it is estimated that one in three of them has some degree of hearing loss.

Under existing relay conditions, achieving the same VCO capability (hearing and reading together,) as CapTel, requires two phone lines, three-way calling, the savvy to set it up, and the cognitive ability to manage this complicated process quickly before the call is disconnected. This particular VCO service is called two line VCO (2LVCO). For many people, 2LVCO is not an option either due to cost, lack of technological know-how, or

the cognitive ability to manage the call. Very few people who could benefit from 2LVCO, actually use it, even though the end result is a more natural and satisfactory phone call. We agree with Hamilton, that CapTel will appeal to and therefore reach a segment of the population that has traditionally been reluctant to use relay, thereby making relay more ubiquitous.

SHHH sees CapTel as a potential breakthrough for VCO users. We say potential because we agree with commenter David Coco, that there are still some bugs to be worked out in the technology. The dial-through feature utilized in the CapTel service superbly improves functional equivalence, saving time and frustration, and it works today. On the other hand, CapTel's ability to provide text quickly in synchronicity with the voice of the original speaker is not perfected yet. Although Ultratec's Fastran system speeds up the CA's relaying of the message, for those people who can hear the voice but not understand all of it, the occasionally significant lag time between voice and text creates comprehension problems.

With several trials of CapTel ongoing, and more planned, Ultratec is well aware of the need to reduce the lag time and consumers in the trials are encouraged by their responsiveness to suggestions for technology improvements. SHHH agrees with TDI that the Commission should review the status of the CapTel technology in three years.

CapTel Should Not Be Made a Mandatory Component of Relay

Because the technology is proprietary and still in development we agree with Ultratec that CapTel itself should not be made a mandatory component of relay. Consumers in the states can advocate their state relay boards to provide CapTel as part of the state relay service. CapTel is not so much a new relay service as a more functionally equivalent way of providing VCO, with a direct connection feature, and voice and text over one line.

The Commission has found that VCO services should be mandatory, but the current way that VCO is provided removes access to the other party's voice. Standard VCO thus provides only partial access to telephone communication. People with residual hearing are eager for technological innovation, particularly in the area of VCO, which is their preferred way of using the relay service. If CapTel is made mandatory it will likely stifle the incentive for Ultratec, and other companies to take VCO technology to the next level. Though we agree with TDI that the Commission should review the status of CapTel in three years, we suggest broadening the scope to an analysis of current and future VCO technologies in three years, and that the motivation for the review would be an analysis of the technology progress, rather than to transition from optional to mandatory.

The Commission Should Grant Ultratec's Request for Permanent Waiver From STS, VRS, and HCO.

SHHH supports Ultratec's request for waivers on STS, VRS, and HCO. These services are not applicable to CapTel and should therefore naturally be exempt from those requirements. STS, HCO, and VRS users will not even want to use CapTel. STS

does not involve transcription of speech into text by a CA; neither does HCO, nor VRS. It is not a matter of being technologically infeasible but rather a matter of whether or not every relay service has to fulfill every other relay service's functionality.

There Should Be No Permanent Waivers for Technical Infeasibility

Worldcom, in its comments, states that the Commission should permanently waive those mandatory minimum requirements for innovative relay services that are technically infeasible for those services. They give as an example permanently waiving the requirements for IP-Relay providers to offer VCO, STS, 911, and pay-per-call access, since it is technically infeasible to provide these capabilities over IP-Relay

SHHH does not support permanent waivers on the basis of technological infeasibility as it is usually a temporary condition. Also, the claim of technical infeasibility has been misused in the past with regard to relay. In its very first Report and Order on TRS, the Commission mandated the provision of VCO as a required relay service needed to achieve functional equivalency. Claims were made that VCO was technically infeasible. But Ultratec developed the proprietary VCO technology and proved them wrong. Now WorldCom requests waiving VCO for IP-Relay due to technological infeasibility. SHHH believes VCO on IP-Relay could very well be feasible if the user has an IP phone.

Cross-Service Functions Should not be Permanently Waived

There are areas that all services should have to provide, including new innovative services, and those are cross-service functions such as carrier of choice, CA gender, and Spanish relay, for example. These requirements are relay preferences and can be provided through caller profiles. SHHH does not agree with WorldCom that these minimum requirements be permanently waived for new services. In fact, Ultratec did not request a waiver for these minimum requirements.

CapTel Should Meet the Same Quality Standards As Existing Relays

David Coco raises some important issues regarding assessing the quality of CapTel and Fastran. SHHH agrees that the error rate needs to be assessed by a third party. We also agree that because CapTel is using voice recognition technology a new set of rules for quality assessment may be necessary. Simply measuring transmission speed (WPM) will not be adequate. The software can have a low error rate but still introduce significant comprehension problems. SHHH believes that CapTel should meet quality standards no different from those that any other relay already is required to do, and that includes monitoring of CapTel agent training and agent performance.

We do not agree however, with David Coco's suggestion that CapTel agents should be able to interrupt the conversation if needed and ask the speaker to slow down. This would be a backwoods move in terms of functional equivalence. Consumers tell us that the beauty of CapTel is the invisibility of the CapTel agent. They do not want the agent to have any speaking role in the call. They want the agent to be completely invisible. Consumer users of CapTel can themselves tell the other party to slow down if

necessary. This allows for a more natural phone conversation with consideration for the hearing party.

SHHH heartily agrees with commenter Judith Viera in the need to consider the hearing people who are using the relay too. Though there is more awareness among the general public about relay, the comfort level is still low. With CapTel the hearing party might not even realize the call is being made through relay, the conversation flow is natural, and that brings us closer to functional equivalence.

Conclusion

SHHH supports Ultratec's petition. CapTel, an innovative VCO, is exciting and opens up a more natural, functionally equivalent way for people with residual hearing and speech to use the relay. It will have particular impact in the workplace because the calls are shorter, invisible as far as CA involvement, and therefore more professional for workplace calling and more acceptable to employers, employees and clients.

SHHH appreciates the opportunity to comment on this proceeding.

Respectfully submitted,

Brenda Battat
Director of Public Policy and State Development
SHHH
7910 Woodmont Avenue, Suite 1200
Bethesda, Maryland 20814
301.657.2248
battat@shhh.org

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